

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

WANDA FAYE JONES,)	
KELLY DORRIS PENDERGRASS, and)	
TIFFANY SHEA JONES,)	
)	Case No. 3:12-cv-0203
Plaintiffs,)	
)	Judge Nixon
vs.)	
)	Magistrate Judge Knowles
ELITE EMERGENCY SERVICES, LLC, and)	
SAMUEL C. CLEMMONS, and)	
SHANNON CLEMMONS, Individually and)	
d/b/a Elite Emergency Services, LLC,)	
)	JURY DEMAND
Defendants.)	

REQUEST FOR PERMISSION FOR LEAVE TO FILE REPLY

Pursuant to the Federal Rules of Civil Procedure, specifically Local Rule 7.01(b) for the Middle District of Tennessee, Plaintiffs request permission for leave to file a reply to Defendants' Response filed August 13, 2014 (Document 149).

Plaintiffs would state that in the interest of justice a reply should be allowed to apprise the Court of egregious facts and circumstances giving rise to Defendants' pre-planned, total default of the settlement agreement. Defendants' Response, which ignores the Court's orders (Documents 138 and 140) specifically retaining jurisdiction to enforce the settlement, is merely the latest evidence that Defendants never intended to pay the settlement, instead hoping to flaunt and evade this Court's inherent jurisdiction and right to enforce its own order approving the settlement.

Respectfully submitted,

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By: /s/ Trevor W. Howell

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2014, a copy of the foregoing *Plaintiffs' Notice Of Intent To File Reply To Defendants' Response In Opposition To Plaintiffs' Motion For Entry Of Final Judgment Against Defendants* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

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